

From: Ex. 6 Personal Privacy (PP)
Sent: 6/20/2017 2:08:56 AM
To: Shea, Valois [Shea.Valois@epa.gov]
Subject: Underground Injection Control Program's Draft Permits for the Proposed Dewey-Burdock Uranium Mine and Deep Disposal Wells

In the 1980s I researched the Dewey Burdock area for the Technical Information Project. TIP was involved in several contested case hearings in before the South Dakota Board of Minerals and Environment and its predecessor board. We were also involved in several appeals before the US Forest Service for previous attempts to explore and/or mine uranium in this area. I also was involved in the research TIP conducted at the Gilt Edge Mine, operated by Brohm Mining Company. TIP sued EPA to get proper NPDES permitting for that mine, but soon acid rock drainage would overwhelm the site. It is now a Superfund site, and EPA is spending a lot of money to bring the problems there under control.

I am concerned a similar fate awaits Powertech's Dewey-Burdock uranium operation if it allowed to proceed. Dewey-Burdock area has thousands of boreholes drilled through the upper confining layers of this proposed ISR operation, and perhaps nearly as many through the lower confining layer. Laws at the time required surface capping only, not fully cemented holes. Further, inspections of the cementing of the holes was extremely haphazard, with, at most, 10 percent of the holes actually inspected. Many of these holes have probably collapsed by now, but they still have punctured the confining layer(s) in multiple places. My concern is that operating an in-situ project in this area will be a disaster.

I am very concerned that continuous oversight of the mine and the quality of liquid wastes pumped into the Minnelusa Formation through the proposed deep disposal wells will be impossible. If this is allowed to proceed, there must be a qualified third-party monitor who is continuously on-site during operations.

Thanks for this opportunity to comment.

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